

ORIGINAL
EDUCATION THAT WORKS
ForsythTech
COMMUNITY COLLEGE

February 20, 2001

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554.

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401 FEB 26 P 1:43
FEDERAL COMMUNICATIONS COMMISSION
HAROLD FURCHTGOTT-ROTH
EX PARTE OR LATE FILED

Commissioner Furchtgott-Roth,

The four community colleges in the Triad region of North Carolina have articulated plans to utilize ITFS technology to expand data and distance learning instruction to our service area. These plans are the latest in an ongoing planning process that each of our individual colleges has undertaken to apply for FCC license of ITFS bandwidth. Our efforts to secure such license have taken place over the past six years. While efforts in the past have been individual, we now are consolidating our planning to utilize ITFS throughout our region. The concentric configuration of urban centers and rural perimeter areas in our region are ideal for ITFS technology. The Triad region of North Carolina encompasses Winston-Salem, Greensboro, Highpoint, Lexington, and Asheboro. This represents a significant portion of the state population and educational market.

ITFS promises benefits to our regional community colleges unobtainable via any other available technology. Through FCC licensure agreements with our commercial partner, WorldCom, our colleges could enjoy the following benefits:

- Free access to much needed wireless broadband services.
- Access to WorldCom Foundation revenue stream allowing purchase of up-to-date hardware.
- Access to valuable spectrum linking educational sites, business and industry, and ultimately, homes and student users.

Any other spectrum assignments by the FCC would offer few of the benefits articulated in the application previously submitted by NC Community Colleges and WorldCom. We are particularly concerned with the competition for ITFS bandwidth represented by 3G devices. These devices provide little of educational value and endanger the availability of bandwidth for much needed educational purposes. We understand these frequencies originally had been set aside to support education. Further, we see no such educational support in growth of personal Internet devices.

We ask you to consider the needs of adult learners, the growth of distance learning, and the expanding broadband needs of public educational institutions in your deliberations related to the future of ITFS.

Attached is the ITFS Utilization Plan developed by the Forsyth Technical Community College in conjunction with the other three community colleges in the Triad area.

Sincerely,


Desna L. Wallin, Ed. D.
President, Forsyth Technical Community College

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An Equal Opportunity Educational Institution

Forsyth Technical Community College Projected ITFS Channel Usage

Information in Table One represents current utilization of data use at Forsyth Technical Community College (FTCC). Currently, Spring Semester curriculum offerings total 964 courses. 55 of these courses are offered via data intensive Distance Learning delivery – telecourses/teleweb courses, online courses, or interactiveTV courses. Total Distance Learning courses are up 95% from last year. Total curriculum courses are up 8% from last year.

We project annual increases for the next three years in the following areas:

- Data traffic related to curriculum courses - 50% increase.
- Online courses - 100% increase.
- InteractiveTV (videoconferencing) - 25% increase.

Substantive utilization of video streaming, video-by-demand, and high-resolution videoconferencing are projected in the next three years.

Online services to students will be greatly expanded in areas of Learning Resources, Student Services, and Distance Learning.

Table One

Services	Peak Usage (proj.)	Hours of Peak Usage	Aggregate Usage	Applications Supported	Number of Courses Utilizing Services
Electronic Mail/Messaging	64 Kb/s	7:30 a.m. - 10:30 p.m.	64 Kb/s	IntraCampus mail; InterCampus Mail; Master Internet Mail, Calendar/Scheduling Functions	100%
Web Content	1 – 10 Mb/s	24 hours	5 Mb/s	Student access to web courses, instructional materials, library, student services, faculty/staff access to Intranet and web resources	50%
File Transfer	1 – 45 Mb/s	7:30 a.m. - 10:30 p.m.	200 Kb/s	Course down load, Backup services, Administrative services	25%
Video/ Audio content	3 Mb/s	7:30 a.m. - 10:30 p.m.	1 Mb/s	Streaming audio and video, Instruction, Student support services, faculty/staff meetings, Staff development	20%
Video Conferencing	1- 10 Mb/s	7:30 a.m. - 10:30 p.m.	1 Mb/s	Public meetings, College meetings, Special instructional sessions @ 768 mgs at 4 sites	10%
High Resolution Video	5.4 Mb/s	7:30 a.m. - 10:30 p.m.	6 Mb/s	Proposed migration from 768 mgs	5%
Inter Campus Connectivity	40 Mb/s	7:30 a.m. - 10:30 p.m.	10 Mb/s	Lan to Lan	100%
Inter Campus Voice Over IP	2.5 Mb/s	24 hours	512 Kb/s	Live Communication/Telephony	25%
Total Usage (estimated)	110 Mb/s		20 Mb/s		

Application areas ranked in order of usage:

Curriculum Courses
Continuing Education Courses
Huskins, Dual Enrollment Courses
Degree Programs
Professional Development
Government

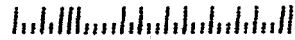
Submitted by: Dr. Bill Randall, February 2, 2001

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Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554



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50 College Road
P.O. Box 30
Supply, North Carolina 28462

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COMMUNITY COLLEGE

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Fax: (910) 754-7805
Visit our website at:
www.brunswick.cc.nc.us

2001 FEB 26 P 1:41

OFFICE OF COMMISSIONER
HAROLD FURCHTGOTT-ROTH

February 18, 2001

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

EX PARTE OR LATE FILED

Dear Commissioner Harold Furchtgott-Roth:

I am writing to express my deep concern over a potentially serious problem facing the educational community-the cellular phone industries attempt to take away the Instructional Television Fixed Service spectrum currently allocated to educational institutions by the Federal Communications Commission. Even if only part of the spectrum is taken away, many groups would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. More importantly, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband Internet services to the educational community and to underserved communities nationwide.

Brunswick Community College is one of 39 Community Colleges in North Carolina committed to the ITFS project. Brunswick Community College's service area is Brunswick County; the 2000 census indicates a population of 71,190. The County encompasses approximately 900 square miles and is primarily rural. We are bordered to the east by the Atlantic Ocean, to the south by the state of South Carolina, to the north by New Hanover County and to the west by Columbus County. The center of our County includes the Green Swamp, encompassing approximately 70 square miles. The major population base is found in three areas- Southport-Oak Island, Leland and the South Brunswick Islands. Even though the College is located in the geographic center of the County, we depend on off-campus centers in Southport and Leland to assist us in meeting the needs of our citizens. Our future plans include an additional off-campus center in the South Brunswick Islands area.

In order to reach our rural population and others who would not otherwise have access to the opportunities that lifelong learning can provide for them, it is important for the College to continue its efforts to link the different areas of the County utilizing the most up-to-date technology available, including wireless cable. As illustrated in our attached Utilization Plan, we will make more programs and courses available to our citizens, particularly those who are handicapped and those who have problems with transportation. Additionally, we will link with the public schools to provide on-site college courses to

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high school students and teacher renewal credit courses for teaches seeking certificate renewal opportunities and with our regional university to provide higher education opportunities. New ITFS/MMDS broadband wireless service is critical to our success in bridging the digital divide, especially in rural Brunswick County.

I urge you to do whatever is necessary to maintain the integrity of the ITFS spectrum and not allow education to bear the brunt of losing its spectrum for 3G transmissions. Thank you for supporting our efforts.

Sincerely,

A handwritten signature in cursive script that reads "W. Michael Reaves".

W. Michael Reaves
President

cc: Parks Todd
North Carolina Community College Systems Office

**BRUNSWICK COMMUNITY COLLEGE
ITFS ESTIMATED USAGE
ONE YEAR**

SERVICES

SERVICE	HOURS PER WEEK
Electronic Mail	68
Web-based information access	68
File Transfer	8
Video access	20
Interactive video	8
Video classes	35
High-resolution video	N/A

**APPLICATIONS
ANNUAL – ONE YEAR**

APPLICATION	CLASSES/PROGRAMS	PARTICIPANTS
Curriculum courses	20	200
Continuing Education courses	20	250
High School courses	8	80
University degree-completion courses	8	40
Professional development	6	70
Administration	4	80
Government	2	30
Military Training	N/A	N/A
Other	N/A	N/A

BRUNSWICK

COMMUNITY COLLEGE

P.O. Box 30 ~ Supply, NC 28462-0030

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

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ITS Mississippi Department of
Information Technology Services

David L. Litchliter, Executive Director

00-258
Suite 508, 301 North Lamar Street
Jackson, MS 39201-1495
Phone: 601-59-1395
Fax: 601-354-6016

ORIGINAL

February 13, 2001

2001 FEB 26 P 1:37
OFFICE OF COMMISSIONER
HAROLD FURCHGOTT-ROTH

Commissioner Harold W. Furchgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 30554

EX PARTE OR LATE FILED

Dear Commissioner Furchgott-Roth:

I am concerned about the future of the Instructional Television Fixed Service (ITFS) spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. The **Mississippi EDNET Institute** and its ITFS spectrum play an important part of the Mississippi Department of Information Technology Services' effort to serve the citizens of Mississippi. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only in urban areas, but also in many rural areas throughout the State of Mississippi.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home, and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available, but also more affordable.

ITFS does not only benefit schools, students, and adult learners, however. In addition to the broad range of community programming currently carried on ITFS spectrum, the recent two-way order has filled a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless communications companies, ITFS spectrum is being used to bring broadband to underserved populations in rural, urban, and otherwise isolated communities nationwide. Mississippi's ITFS licenses have more complete coverage than any state in the country, while Mississippi has the greatest distance to travel to bridge the Digital Divide. As stated by Mississippi Governor Ronnie Musgrove in a recent report, "Creating Economic Prosperity for a New Century," our state intends to fully utilize these ITFS licenses to provide available, affordable Internet access in rural areas to both small businesses and to homes. ITFS licensees are, therefore, serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

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If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service, and signal interference. In either scenario, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community and to underserved communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. We hope that you will support us in maintaining the integrity of the spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,

A handwritten signature in black ink, appearing to read "SA Adamec, Jr.", with a stylized flourish at the end.

Stephen A. Adamec, Jr.
Chairman, ITS Board of Directors

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Commissioner Harold W. Furchgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 30554



PO Box 188
Kinston, NC 28502-0188

Telephone 252.527.6223
Fax 252.527.1199

Community College

"Change Your World"

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HAROLD FURCHTGOTT-ROTH
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February 22, 2001

EX PARTE OR LATE FILED

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Furchtgott-Roth:

The North Carolina Community College System Wireless Technology Consortium needs your help. This effort has been building for five years. Now, because of opposition, we are in danger of losing the very bandwidth that we need for this project to come to fruition.

We are faced with the defeat of a statewide collaboration that could provide state-of-the-art technology for educational life-long-learning for rural areas with an affordable price tag. The proliferation of mobile/handheld devices threatens to take over the bandwidth that is needed for these educational opportunities. Many hours of preparation in the development of the consortium will have been wasted. These channels are critical to the implementation of the network for the NCCCS.

North Carolina has the leadership to ensure the success of our wireless network, which is the next step in closing the digital divide. We feel that we have demonstrated, over the past five years, the need and the ability to use these channels.

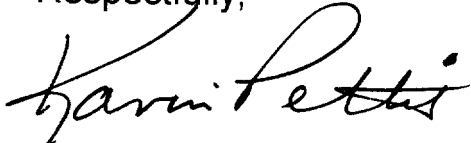
At Lenoir Community College, we feel that our services will be enhanced by the use of wireless technology. Services we will provide

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over the network include electronic mail for remote campuses, help desk assistance, video conferencing, remote access to student services and additional distance education capabilities as well as many others. You can help us to achieve this vision by working to retain the MMDS and ITFS channels for educational use.

Respectfully,

A handwritten signature in black ink, appearing to read "Karin Pettit". The signature is fluid and cursive, with a large initial "K" and a distinct "P" for "Pettit".

Dr. Karin Pettit, President
Lenoir Community College

cc: Bryan Tramont, Legal Counsel
Office of Commissioners Harold Furchtgott-Roth

PO Box 188
Kinston, NC 28502-0188

Community College

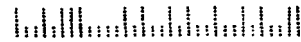
"Change Your World"

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Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554





Delta State University

Division of Continuing Education

February 19, 2001

Commissioner Furchgott-Roth
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: *FCC 00-455*
ET Docket No. 00-258
RM-9920 and 9911

EX PARTE OR LATE FILED

Dear Commissioner Furchgott-Roth:

I am concerned about the future of the Instructional Television Fixed Service (ITFS) spectrum which is in danger of being reappropriated to accommodate the cellular telephone industry. In a recent Notice of Proposed Rulemaking issued by the FCC, cellular phone companies petitioned to open the ITFS spectrum for more cellular telephones. This spectrum has been specifically reserved for educational purposes and if taken away Mississippi will lag behind and the 'digital divide' will increase further.

In light of the recent budget cuts, Delta State University is pursuing creative and economic solutions for course/program delivery. DSU has utilized EdNet's capabilities in the past to deliver video courses, but we have recently realized the full magnitude of possible uses which include two-way interactive delivery and using high-speed Internet services to reach the rural businesses and homes throughout our region.

As Director of Continuing Education for Delta State, it is my mission to deliver educational opportunities to individuals in the state who are unable to attend the campus due to time and place deterrents. These individuals constitute the lifelong learners who make a difference in our economy and our future. It is this adult learner segment of the population which is growing at an increasing rate and it is this segment of the population which will suffer the greatest. Taking away a resource as vital as the ITFS broadband spectrum will limit what Delta State and other universities are able to deliver to these students, thus limiting opportunities of growth for this great state.

If education is a priority in Mississippi, let's stand in unison and fight to preserve this resource as it was intended; a delivery method to provide educational opportunities to homes, businesses and schools.

Thank you for your time and consideration.

Sincerely,

Lori L. Hoskins, Director

cc: David L. Potter, President

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OFFICE OF COMMISSIONER
HAROLD FURCHGOTT-ROTH



Delta State University
Division of Continuing Education
Box C-1 Ewing 130
Cleveland, MS 38733

Commissioner Furchgott-Roth
Federal Communications Commission
445 12th St., SW
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RCCC

Rowan-Cabarrus Community College

00-258/
Post Office Box 1595
Salisbury, North Carolina 28145-1595
Phone 704 637-0760

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FEDERAL COMMUNICATIONS COMMISSION
HAROLD FURCHTGOTT-ROTH

February 16, 2001

EX PARTE OR LATE FILED

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Commissioner Furchtgott-Roth:

I am writing you today to express my deep concern over the current move by representatives from the 3-G industry (third generation of mobile/handheld devices) to take over the broadband spectrum tentatively designated for the ITFS consortium of North Carolina community colleges. Rowan-Cabarrus Community College is one of 39 community colleges in the state committed to the ITFS project, a vision of a statewide wireless educational network that will have the capability to reach rural populations and others who would not otherwise have access to the opportunities that lifelong learning can provide for them. In a cooperative partnership with public schools and public universities, the community colleges have formed a consortium that will provide a seamless web of lifelong learning to the public, while at the same time preserving the autonomy of each entity to enable them to address the unique needs of their local population.

Thousands of man-hours and millions of dollars have been invested by the community colleges and their partner, WONC, over the last five years, to transform this vision into a reality for the citizens of North Carolina. The partnership with WONC is unique in that WONC is half-owned by CT Communications, based in Concord, NC. CT Communications, as a local and statewide provider of telecommunications services, is thoroughly familiar with the state's service area and has proven efficient in providing services to rural areas with a low population base, while still turning a profit. In addition, CT Communications has an established commitment to education, and has been a staunch supporter of our own community college. CT Communications has sponsored and

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funded a small business counseling and educational center on our campus in Cabarrus County and provided us with technical equipment, advice, and expertise. WorldCom, the other half-owner of WONC, brings to the partnership access for the community colleges to the WorldCom Foundation, with a revenue stream that will provide for hardware upgrades, and a scale of operations that can provide for greatly reduced cost of services to their educational partners. This valuable partnership, which forms the basis of the consortium, therefore brings benefits that could not be duplicated if consideration was given to an alternate proposal by 3-G members to provide services to us in exchange for reallocation of the bandwidth.

Little recognition nationwide has been given to the terrific strain technological change has placed on public educational institutions, their resources, and their ability to provide valuable services. Reallocation of any of the MMDS or ITFS bandwidth to commercial use for 3-G providers will significantly damage, perhaps permanently, the ability of North Carolina educators to provide this valuable educational resource to the state and its citizens. While 3-G providers could be accommodated through other frequencies, the same cannot be said for the ITFS consortium. Transfer of the ITFS allocation to other frequencies will result in higher equipment costs due to the requirement of higher-powered transmitters, costs public institutions can ill afford to absorb. Further, the effective provision of lifelong learning opportunities necessitates access not just to educational sites, but also to businesses, industries, and homes. The currently allocated bandwidth is thus the optimum frequency allocation for this educational consortium.

The ITFS project, as it is currently envisioned, and the allocation of the bandwidth to the ITFS consortium, will enable Rowan-Cabarrus Community College to expand tremendously its educational offerings through the use of wireless technology. In terms of curriculum courses, the ITFS bandwidth will give RCCC the capacity to more than double its course offerings and degree and certificate programs. In addition, RCCC currently offers 44 classes to the general public which are classified as continuing education courses. With the MIDI/ITFS bandwidth, RCCC currently has plans to expand its offerings in this area to more than 100 classes. Furthermore, the ITFS project will be instrumental in assisting our college to broaden its offerings in the areas of university degree completion programs, and Huskins/dual enrollment classes, one of our active partnerships with high schools in two North Carolina counties.

The ITFS consortium represents a rare opportunity for an educational system to take a quantum leap in the implementation of technology. Public education is at a great disadvantage, compared to private institutions and commercial providers, when attempting to keep pace with rapid changes in technology. I urge you to step forward and

support the future of education in North Carolina by holding steadfast to the original plan to allocate this bandwidth to the ITFS consortium.

Sincerely,



R. L. Brownell

President

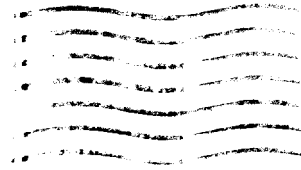
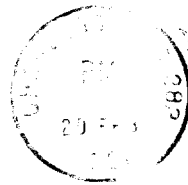
dsp

cc: Chairman Michael K. Powell
 Senior Legal Advisor Peter A. Tenhula, Office of Chairman Michael K. Powell
 Commissioner Susan Ness
 Senior Legal Advisor Mark Schneider, Office of Commissioner Susan Ness
 Legal Counsel Bryan Tramont, Office of Commissioner Harold Furchtgott-Roth
 Commissioner Gloria Tristani
 Legal Advisor Adam Krinsky, Office of Commissioner Gloria Tristani
 Chief Thomas J. Sugrue, Wireless Telecommunications Bureau
 Associate Chief Diane Cornell, Wireless Telecommunications Bureau
 Chief Julius Knapp, Office of Engineering and Technology
 Chief Richard B. Engleman, International Bureau
 Chief Roy Stewart, Mass Media Bureau
 Chief Barbara Kreisman, Mass Media Bureau
 Associate Bureau Chief Glenn Reynolds, Common Carrier Bureau
 Jared M. Carlson, Common Carrier Bureau
 Senator John Edwards
 Senator Jesse Helms
 Representative Robert Hayes
 Representative Melvin L. Watt
 NC Community College System President Martin Lancaster
 NC Community College System Telecommunications Services Director Parks Todd
 Wake Technical Community College President Bruce I. Howell
 RCCC Board of Trustees
 RCCC Vice Presidents



RCCC

Rowan-Cabarrus Community College
Post Office Box 1595 • Salisbury, North Carolina 28145-1595



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Federal Communications Commission
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Washington, DC 20554



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Commissioner Furchgott-Roth
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FEDERAL COMMUNICATIONS COMMISSION
HAROLD FURCHGOTT-ROTH

ORIGINAL

Re: FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911

January 21, 2001

EX PARTE OR LATE FILED

Dear Commissioner Furchgott-Roth:

I write to you on behalf of *Linn-Benton Community College* to express our concern about a recent Federal Communications Commission (FCC) Proposed Rule Making that will have an immediate and disastrous impact on our ability to meet a growing demand among Oregon students for accessible, flexible educational opportunities. The FCC has issued a Notice of Proposed Rule Making (ET Docket No. 00-258, RM-9920 and 9911) seeking comment on a plan to relinquish Instructional Television Fixed Service (ITFS) channels to cellular phone companies for third generation (3G) mobile telephone services, stripping *Linn-Benton Community College* and thousands of other schools across the nation of a powerful and irreplaceable medium. ITFS is an important part of *Linn-Benton Community College's* goal to share educational resources among schools and to provide distance learning opportunities and workforce training directly to students at home, at work, and at neighborhood learning centers. Moreover, ITFS is absolutely critical if wireless broadband is to become a reality not only for our students but also for our entire community.

School districts, colleges, universities, and other educational organizations across the country hold thousands of ITFS licenses, many of which were issued decades ago. Recent FCC rule changes have expanded the educational power of ITFS from one-way video to interactive video, wireless broadband Internet access and advanced learning services to students and adult learners in classrooms, homes and workplaces. ITFS now offers educational institutions throughout the country an affordable high-speed on-ramp to the Internet, a mission that was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

Linn-Benton Community College is at the forefront of advancing the new learning services made possible by recent FCC rule changes and we have invested a great deal of time and resources to develop the ITFS spectrum for educational outreach in Oregon. *Linn-Benton Community College* is an active member of the Oregon Wireless Instructional Network (Oregon WIN), a consortium of nine universities and community colleges that operates a multi-channel ITFS network in Oregon's Willamette Valley capable of serving over 65% of Oregon's population. The consortium operates under an Intergovernmental Agreement, is governed by a seven-member board, and works closely with educational ITFS licensees in Bend and Medford, Oregon (see attached list of Oregon ITFS licensees).

Oregon WIN was formed in 1993 for the purpose of jointly developing the ITFS spectrum in Oregon as a much needed "last mile" network solution. The consortium recently completed a \$1.8 million network after spending years filing for ITFS licenses, building the consortium, issuing a national RFP for a commercial partner to develop the spectrum and designing an interconnected,

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6500 Pacific Blvd SW Albany, Oregon 97321 (541) 917-4999

shared network. Oregon WIN operates three ITFS transmission sites in Eugene, Salem and Portland. The sites are linked with multiple, two-way microwave paths, allowing educational providers to serve all three ITFS networks from a single location. Inexpensive ITFS receive antennas are easily installed directly to schools, government offices, businesses and homes. The flexible system allows the delivery of a diverse range of programs including live interactive courses, telecourses, information boards, and cultural events. Oregon WIN members, participating members, and associated institutions offer over 2500 distance learning courses in 65 degree programs (<http://oregonone.org>) to over 29,000 students per year. The Oregon WIN ITFS network is of growing importance in meeting Oregon's distance education needs. With the imminent rollout of two-way broadband data services over the ITFS spectrum, Oregon WIN will provide the full range of video, data and Internet services critical to quality distance education programs and services provided by Oregon's universities and community colleges.

In addition to meeting important, "last mile" networking needs, ITFS is attractive because system development occurs by partnering with the private sector. Through an excess capacity lease agreement with Sprint Corporation, Oregon WIN members are able to focus their resources on educational programming and services and not on telecommunication infrastructure development and operations. FCC rulings over the past ten years have greatly improved the ability for educators and commercial operators to form successful partnerships in the development of the ITFS spectrum. Working in conjunction with wireless communications companies, ITFS is helping to bring broadband to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the nation bridge the Digital Divide.

If the FCC reallocates any part of the ITFS spectrum for 3G mobile device services, the Oregon WIN partnership and network will collapse. Oregon WIN members would either lose their ITFS service altogether or face new equipment costs, service disruption and signal interference. In addition, Oregon WIN would lose our partnership with the private sector and face the prohibitive costs of rebuilding and operating the network. The spectrum would no longer be available for advanced wireless broadband services to the educational community and to underserved communities nationwide.

As a result of the critical need in Oregon for "last mile," broadband services and our extensive planning and financial investment in developing the ITFS spectrum for educational outreach, *Linn-Benton Community College* strongly oppose any reallocation of the ITFS spectrum to 3G mobile device services. Reallocation under FCC Notice of Proposed Rule Making (ET Docket No. 00-258, RM-9920 and 9911) is counter to recent FCC rulings which allow educators to fully and effectively develop the spectrum for educational use, and is counter to many local, state and national reports calling for increased access to broadband services to provide educational opportunities to students anywhere, at anytime. If the ITFS spectrum is compromised, these public benefits will be lost. We at *Linn-Benton Community College* hope that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and well. Thank you for your support.

Sincerely,



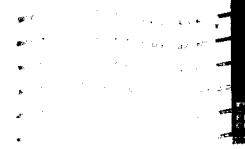
Jon Carnahan

President,

Linn-Benton Community College



LINN-BENTON COMMUNITY COLLEGE
6500 PACIFIC BLVD SW
ALBANY, OREGON 97321



Commissioner Furchgott-Roth
Federal Communications Commission
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